**Presspart Retirement Benefits Scheme**

Implementation Statement – 2021/22

April 2022

1. **Introduction** 
   1. The purpose of the Implementation statement is to help ensure that the actions of Trustees of the Presspart Retirement Benefits Scheme (the Scheme) have followed the intent of the Statement of Investment Principles prepared by the Trustees.
   2. In preparing this statement the Trustees have consulted Presspart Manufacturing Limited, the Principal Employer, and obtained input from Rathbone Investment Management Limited, the Scheme’s fund manager.
   3. The statement has been prepared with regard to the 2018 regulatory changes to the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013. The 2019 changes were made in order to implement the European Union’s amended Shareholder Rights Directive II (SRD II), requiring further detail on trustees’ stewardship policies to be added to pension scheme SIPs by 1 October 2020.
2. **Areas of Focus**
   1. Under the new legislation, the Trustees are required – in addition to those requirements under the 2018 changes, to prepare an annual implementation statement setting out, how the SIP has been followed over the year, also to be published on a publicly available website
   2. From 1 October 2021, Trustees of the Scheme will be required to produce an annual Implementation Statement on their engagement and voting practices and to publish these on a publicly available website by 1 October 2021. This statement will cover the implementation of their policies pertaining to the exercise of rights (including voting rights) attaching to the investments and undertaking engagement activities in respect of these investments.
   3. Description of voting behaviour (including “most significant” votes by, or on behalf of, the trustee) and any use of a proxy voter during the year.
   4. The SIP states that the fund managers will present an annual stewardship engagement report, detailing proxy voting record, ESG engagement and indicators of responsible non-financial performance. The IPS demonstrates how the Trustees have monitored and engaged with the investment managers approach to voting.
   5. The investments of the portfolio will be managed within parameters focussed on Socially Responsible Investment, Corporate Governance and Voting Rights
   6. The Trustees are comfortable that the investment manager is managing the relevant funds with ESG considered in a reasonable way for each particular asset class and within particular guidelines and restrictions. The Scheme’s fund manager is expected to ultimately act in the best interests of the Scheme’s assets to maximise returns for a given level of risk, subject to certain constraints.
3. **Implementation of voting rights**
   1. The Scheme assets equity holdings are structed in two ways: direct equity holdings and pooled equity investment vehicles.
   2. The trustees have followed the SIP closely over the years and Rathbones has presented the annual stewardship engagement report, detailing proxy voting record, ESG engagement and indicators of responsible non-financial performance for all the direct equity holdings, please see appendix 1
   3. As per the SIP voting has been delegated to the investment manager and is in line with the Rathbones policy of investing responsibly, please see appendix 2.
   4. The voting carried out on behalf of the Scheme is monitored yearly with a full break down of the number of opportunities the Scheme had to vote, how many times the Scheme voted and why the decision to vote in specific ways was made, see appendix 1.
   5. The investment manager provided a case by case breakdown of 10 significant votes over the year. These were on company issues or that were significant to the Scheme because of the subject-matter, see appendix 1.
   6. The investment manager has used Proxy voting services over the year. They have used a combination of ISS and
   7. In the pooled funds, voting entitlements (where they arise) generally lie with the asset manager, as the legal owner of the securities in the fund. However, the Trustees have discussed with the investment manager how stewardship, including votes will be exercised on their behalf in support of their investment and stewardship beliefs and objectives when choosing to appoint and retain managers.

**Appendix 1.**

**Vote reporting**

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| **As At the 05.04.22** |  |
| **Voting Questionnaire** | **Response** |
| Scheme Name | The Presspart Retirement Benefits Scheme |
| Employer Name | H&T Presspart |
| Investment Manager Name | Rathbones |
| Scheme year end date | 5th April |
| Start of reporting period | 6th April 2021 |
| End of reporting period | 5th April 2022 |

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| **Fund Mandate Informaion** | **Response** |
| What is the Fund's Legal Entity Identifier (LEI) (if applicable) |  |
| What was the total size of the fund/mandate as at the end of the Reporting Period? | £19,996,962 |
| Total size of Scheme assets invested in the fund/mandate as at the end of the Reporting Period (if known)? | £19,996,962 |
| What was the number of equity holdings in the fund/mandate as at the end of the Reporting period? | 21 |

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| **Voting Policies** | **Response** |
| What is your policy on consulting with clients before voting? | We are a discretionary fund manager, clients give delegated authority for all aspects of their portfolio management to Rathbones. We set voting policy centrally based on recognised best practice. As such we do not actively seek out the views of clients before voting. However, we are open to hearing from clients where they have views on specific voting items and are prepared to issues split votes to reflect those instructions. |
| Please provide an overview of your process for deciding how to vote. | Our Responsible Investment Policy commits us to voting on 95% of our assets by value. Our active voting lists comprises our top holdings in UK and international equity, collectives and a subset of smaller companies where we account for greater than 2.5% of shares in issue. |
| How, if at all, have you made use of proxy voting services? | We use a proxy voting provider to implement our bespoke voting policy. We also use their proxy voting platform. |
| What process did you follow for determining the “most significant” votes? | Largest votes against management that took place at a company's AGM |
| Did any of your “most significant” votes breach the client’s voting policy (where relevant)? | N |
| If ‘Y’ to the above. Please explain where this happened and the rationale for the action taken. |  |

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| **Voting Policies** | **Response** |
| Are you currently affected by any of the following five conflicts, or any other conflicts, across any of your holdings?  1) The asset management firm overall has an apparent client-relationship conflict e.g. the manager provides significant products or services to a company in which they also have an equity or bond holding;  2) Senior staff at the asset management firm hold roles (e.g. as a member of the Board) at a company in which the asset management firm has equity or bond holdings  3) The asset management firm’s stewardship staff have a personal relationship with relevant individuals (e.g. on the Board or the company secretariat) at a company in which the firm has an equity or bond holding  4) There is a situation where the interests of different clients diverge. An example of this could be a takeover, where one set of clients is exposed to the target and another set is exposed to the acquirer  5) There are differences between the stewardship policies of managers and their clients Please include here any additional comments which you believe are relevant to your voting activities or processes | We are potentially affected by all 5, but our major conflict of interest is where a private client plays a role on the board of a company where we have an ESG issue. In such circumstances, the affected party can vote as they wish, but their instructions do not affect the group view, say, on executive remuneration. All other conflicts are managed under Rathbones' standard conflicts of interest policy. |

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| **Voting statistics (applicable to the scheme's reporting period)** | **Response** |
| How many meetings were you eligible to vote at? | 2085 |
| How many resolutions were you eligible to vote on? | 24869 |
| What % of resolutions did you vote on for which you were eligible? | 38.56% |
| Of the resolutions on which you voted, what % did you vote with management? | 96.31% |
| Of the resolutions on which you voted, what % did you vote against management?**\*** | 3.60% |
| Of the resolutions on which you voted, what % did you abstain from voting? | 1.61% |
| In what % of meetings, for which you did vote, did you vote at least once against management? | N/A |
| Which proxy advisory services does your firm use, and do you use their standard voting policy or created your own bespoke policy which they then implemented on your behalf? | ISS - we subscribe to their sustainability voting policy. We also have our own bespoke voting policy. |
| What % of resolutions, on which you did vote, did you vote contrary to the recommendation of your proxy adviser? (if applicable) | 5.03% - % of votes made against our policy recommendations |

**\***Please note that Rathbones managers retain the ability to enter voting instructions which differ from the house view. It is therefore possible for us to enter a split vote in each situation — meaning that for each votable item on a company agenda, we might enter a combination of votes. This means that the numbers expressed as a percentage would not be expected to add up to 100%. We state the percentage to provide some sense of relative scale.







**Appendix 2.**

**Rathbones approach to responsible investing**





